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Global LLC, Fisher Brothers Management Co. LLC, Fisher  
Brothers Financial and Development Company LLC, Arnold  
Fisher, Kenneth Fisher, Steven Fisher, and Winston Fisher*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 GEORGE JARAMILLO, II, an individual,

13 *Plaintiff,*

14 v.

15 AREA 15 LAS VEGAS LLC, a Delaware  
16 Limited Liability Company, AREA 15  
GLOBAL LLC, a Delaware Limited  
17 Liability Company, ARNOLD FISHER, an  
Individual, KENNETH FISHER, an  
18 Individual, STEVEN FISHER, an  
Individual, WINSTON FISHER, an  
19 Individual, FISHER BROTHERS  
MANAGEMENT CO. LLC, a New York  
20 Limited Liability Company, FISHER  
BROTHERS FINANCIAL AND  
21 DEVELOPMENT COMPANY LLC, a  
New York Limited Liability Company, and  
22 DOES 1-50 Inclusive,

23 *Defendant.*

24 CASE NO.: 2:21-cv-00891-RFB-BNW

25 **STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

26 **(FIRST REQUEST)<sup>1</sup>**

27 Plaintiff GEORGE JARAMILLO, III (“*Plaintiff*”), by and through his undersigned counsel  
of record, the law firms of Brown, Clark, Le, Ames, Stedman & Cevallos LLP and Kaplan Cottner,  
and Defendants AREA 15 LAS VEGAS LLC, AREA 15 GLOBAL LLC, ARNOLD FISHER,

28 <sup>1</sup> This is the second request as it relates to the Area 15 Defendants.

1 KENNETH FISHER, STEVEN FISHER, WINSTON FISHER, FISHER BROTHERS  
2 MANAGEMENT CO. LLC, and FISHER BROTHERS FINANCIAL AND DEVELOPMENT  
3 COMPANY LLC (together, “**Defendants**”), by and through their undersigned counsel of record,  
4 the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate to an extension of time to  
5 respond to the Complaint, pursuant to FRCP 6(b) and LR IA 6-1, as set forth below:

6 1. On May 6, 2021, Plaintiff filed his Complaint in this Court against Defendants. *See*  
7 *generally* ECF No. 1.

8 2. Defendants Kenneth Fisher, Steven Fisher, Winston Fisher, and Fisher Brothers  
9 Management Co. LLC (the “**Fisher Defendants**”) have all been served with the Summons and  
10 Complaint, and their response deadlines are as follows:

11 a. Steven Fisher: June 21, 2021

12 b. Kenneth Fisher: June 23, 2021

13 c. Winston Fisher: June 30, 2021

14 d. Fisher Brothers Management Co. LLC: June 30, 2021

15 3. Defendant Arnold Fisher has not yet been served and the undersigned counsel has  
16 agreed to accept service on his behalf.

17 4. Defendant Fisher Brothers Financial and Development Company LLC contends that  
18 the attempted service upon it reflected in ECF No. 8 was improper; nevertheless, the undersigned  
19 counsel has also agreed to accept service on its behalf.

20 5. Pursuant to this Court’s order, the responses of Area 15 Las Vegas LLC and Area  
21 15 Global LLC (the “**Area 15 Defendants**”) are due July 1, 2021. *See* ECF No. 12.

22 6. To streamline and provide sufficient time to consolidate the responses for the  
23 multiple Defendants in this case, as appropriate, and in the interest of judicial efficiency and  
24 conserving resources, the parties have agreed to a global response date for all of the foregoing  
25 Defendants of August 2, 2021.

26 7. This Court may extend the deadline to respond to the Complaint for good cause. *See*  
27 FRCP 6(b)(1).

28 8. There is good cause to grant the extension of time to respond to the Complaint

1 requested herein, to allow counsel the further opportunity to more fully evaluate and investigate the  
2 Complaint's 102 factual allegations alleged against each of the Defendants, prepare the proper  
3 response(s) thereto on behalf of each of them, and to consolidate responses for this Court's ease of  
4 consideration and review, where appropriate.

5       9.      The instant request is timely, as the first deadline for any of the above Defendants  
6 to respond to the Complaint is June 21, 2021. *See* FRCP 6(b)(2) (only requiring an analysis of  
7 excusable neglect where extension sought after expiration of the deadline); LR IA 6-1(a) (same).

8       10.     This is the Fisher Defendants' first request for an extension of time to respond to the  
9 Complaint and the Area 15 Defendants' Second Request.

10      11.     Defendants expressly reserve any and all defenses available to them, including, but  
11 not limited to, those set forth in FRCP 12(b)(1)-(7).

12      12.     The parties make the instant request in good faith and without any intent to delay  
13 these proceedings.

14       Based on the foregoing, Plaintiff and Defendants stipulate that the responses of all  
15 Defendants shall be filed on or before August 2, 2021.

16       DATED 20th day of June, 2021.

17       BROWNSTEIN HYATT FARBER SCHRECK, LLP

KAPLAN COTTNER

18      BY: /s/ Travis F. Chance  
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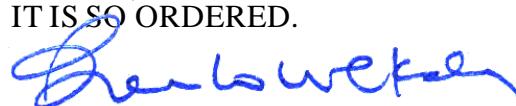
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22       *Attorneys for Plaintiff George  
Jaramillo, II*

23       IT IS SO ORDERED.

24         
UNITED STATES MAGISTRATE JUDGE

25       Dated June 21, 2021